

1 MICHELLE D. SPENCER, CBN 164696  
2 LAW OFFICE OF MICHELLE D. SPENCER  
3 55 River Street, Suite 100  
Santa Cruz, CA 95060  
Tel: 831 458 0502  
Fax: 831 515 5053

5 Attorney for Juan Guzman

6  
7  
8 IN THE UNITED STATES DISTRICT COURT  
9  
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
11 SAN JOSE DIVISION

12  
13 UNITED STATES OF AMERICA,

CASE NO: CR12-00742- LHK

14 Plaintiff,

15 v.

16 JUAN GUZMAN,

17  
18 STIPULATION AND [PROPOSED] ORDER  
CONTINUING STATUS CONFERENCE TO  
MARCH 20, 2013 AND EXCLUDING TIME  
UNDER THE SPEEDY TRIAL ACT

19 Defendant.

20  
21 The parties, Juan Guzman, and the government, by and through their respective  
22 counsel, hereby stipulate, subject to the Court's approval, that the status conference currently  
23 scheduled for February 27, 2013 be continued to March 20, 2013 at 9:00 a.m. for further  
24 status.

25 Defense counsel requires additional time to conduct further case review and  
26 investigation.

1 IT IS SO STIPULATED.  
2

3 Dated: February 22, 2013

MELINDA HAAG  
United States Attorney

5 /S/

6 AMIE ROONEY  
7 Assistant United States Attorney

8 Dated: February 22, 2013

9 /S/

10 MICHELLE D. SPENCER  
Counsel for Juan Guzman

11  
12 [PROPOSED] ORDER

13 GOOD CAUSE APPEARING, and upon the stipulation of the parties,

14 IT IS HEREBY ORDERED that the status conference currently scheduled for defendant  
15 Juan Guzman on February 27, 2013 shall be continued to March 20, 2013, at 9:00 a.m. for  
16 further status.

17 FURTHER, the Court finds that failing to exclude the time between February 27, 2013  
18 and March 20, 2013, would unreasonably deny defense counsel the reasonable time necessary  
19 for effective defense preparation, taking into account the exercise of due diligence pursuant to  
20 18 U.S.C. § 3161(h)(7)(B)(iv). The ends of justice served by excluding the time between  
21 February 27, 2013 and March 20, 2013, from computation under the Speedy Trial Act  
22 outweigh the interests of the public and the defendant in a speedy trial.

23 ///

24 //

25 /

1 IT IS FURTHER ORDERED that the time between February 27, 2013 and March 20,  
2 2013, shall be excluded from computation under the Speedy Trial Act, 18 U.S.C. §  
3 3161(h)(7)(A), and (B)(iv), and 18 U.S.C. § 3161(h)(1)(D).

4  
5 IT IS SO ORDERED.  
6

7 Dated: 2/25/13

  
THE HONORABLE LUCY H. KOH  
United States District Judge

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28